

REMARKS

Claims 1-6, 12-15, 17-32, 36 and 37 are pending, with claims 1-4, 17 and 18 being independent. Claims 1-4, 6, 15, 17, 18, 21 and 22 have been amended, claims 33-35 have been canceled, and claims 36 and 37 have been added. Claim 1 has been amended to recite an apparatus that finds support in Fig. 2 and the text describing embodiment mode 2 at page 14, line 1 to page 18, line 12. Claims 2, 3, 4, 17 and 18 have been amended to replace the term "TFT" with "thin film transistor." Claim 2 has been further amended to recite that the insulating film comprises fluoroplastics, as set forth in the application in the discussion of embodiment mode 2 at page 14, line 1 to page 18, line 12. Claims 3, 4, 17 and 18 have been further amended to recite that the insulating film is a mixed film including fluoroplastics and metallic oxide, as was previously recited in claims 6, 15, 21 and 22. New claims 36 and 37 find support at, for example, page 14, lines 14-17 and claim 6. No new matter has been introduced.

Claims 1-6, 12-15 and 17-28 have been provisionally rejected for obviousness-type double patenting over claims 1-22 of copending Application No. 10/662,357 in view of Pichler (U.S. Publication No. 2004/0187917). Applicant requests that this rejection be held in abeyance until the claims of the present application and those of the '357 application are otherwise found to be allowable.

Claims 1 and 5 have been rejected as being anticipated by each of Pichler, Park (U.S. Publication No. 2003/0143319) and Song (U.S. Patent No. 6,872,473). With respect to these rejections, claim 1 has been amended so as to recite the features "a substrate," "a thin film transistor over the substrate," "an insulating film over the thin film transistor," "a first electrode over the insulating film and electrically connected to the thin film transistor," "the insulating film comprises a first insulating film and a second insulating film formed on the first insulating film," "the first insulating film comprises a material selected from the group consisting of acrylic, polyamide and polyimide," and "the second insulating film comprises fluoroplastics." Applicant requests reconsideration and withdrawal of these rejections because neither Pichler, Park nor Song describes or suggests a light-emitting device having these features.

Claims 2, 12, 24 and 30 have been rejected as being unpatentable over Kim (U.S. Publication No. 2003/0067266) in view of Song. Claim 2 has been amended so as to recite that the insulating film, which is under an electrode, comprises fluoroplastics. Applicant requests reconsideration and withdrawal of this rejection because neither Kim, Song, nor any proper combination of the two describes or suggests an insulating film comprising fluoroplastics and located under an electrode. In particular, while Kim describes a passivation layer 124 that is formed under the first electrode 126, and Song describes a film comprising fluoroplastics 400 that is formed over the electrode of the EL layer 300, there would have been no motivation to replace Kim's layer 124 with Song's film 400.

Claims 3, 4, 6, 13-15, 17-22, 25-28, 31, 32, 34 and 35 have been rejected as being unpatentable over Kim in view of Song and Seo (U.S. Patent No. 6,642,107). Each of independent claims 3, 4, 17 and 18 has been amended so as to recite an insulating film that is a mixed film comprising fluoroplastics and metallic oxide. Applicant requests reconsideration and withdrawal of this rejection because neither Kim, Song nor Seo describes or suggests such a film. The rejection seems to indicate that such a mixed film would inherently result from the interaction of Kim's electrode and Kim's interlayer insulating film. Applicant respectfully disagrees, and notes that Kim provides no indication that this would be the case.

In addition, there would have been no motivation to combine Kim, Song and Seo in the manner set forth in the rejection. The lack of motivation to combine Kim and Song is discussed above. In addition, nothing in Kim, Song or Seo would have provided motivation to replace Kim's passivation layer 124, which is formed under the first electrode 126 of Kim, with Seo's interlayer dielectric layer 60, which includes Teflon (fluoroplastics) and is formed over an electrode.

Claims 23 and 29, which depend from claim 1, have been rejected as being unpatentable over each of Pichler and Park. Applicant requests reconsideration and withdrawal of this rejection for the reasons discussed above with respect to claim 1.

Applicant submits that all claims are in condition for allowance.

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No fees are believed due. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

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